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JUL 5 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

JODIE L. KELLEY

DIRECT DIAL: 202-639-6058  
INTERNET ADDRESS: jkelley@jenner.com

July 5, 2001

Magalie R. Salas, Esq.  
Federal Communications Commission  
Office of the Secretary  
The Portals  
445 12th St. S.W.  
Room TWB 204  
Washington, D.C. 20554

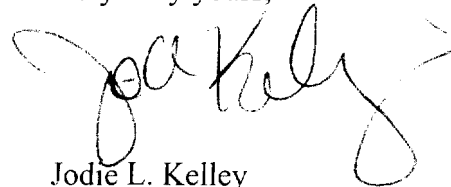
Re: CC Docket No. 00-218

Dear Ms. Salas:

Enclosed for filing please find an original and three copies of "Objections of WorldCom To Verizon Virginia Inc.'s Third Set of Discovery to WorldCom." An additional eight copies have been provided in a separate envelope to be delivered to the arbitrator. Finally, an extra copy is enclosed to be file-stamped and returned.

If you have any questions, please do not hesitate to call me at 202-639-6058. Thank you very much for your assistance with this matter.

Very truly yours,



Jodie L. Kelley

No. of Copies rec'd at 3  
List A B C D E

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JUL 5 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	
	)	
In the Matter of	)	
Petition of Cox Virginia Telecom, Inc.	)	
Pursuant to Section 252(e)(5) of the	)	
Communications Act for Preemption	)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
Virginia Inc. and for Arbitration	)	
	)	
In the Matter of	)	
Petition of AT&T Communications of	)	
Virginia Inc., Pursuant to Section 252(e)(5)	)	CC Docket No. 00-251
of the Communications Act for Preemption	)	
of the Jurisdiction of the Virginia	)	
Corporation Commission Regarding	)	
Interconnection Disputes With Verizon	)	
Virginia Inc.	)	

**OBJECTIONS OF WORLDCOM TO  
VERIZON VIRGINIA INC.'S THIRD SET  
OF DISCOVERY TO WORLDCOM**

WorldCom, Inc. respectfully submits its objections to Verizon Virginia, Inc.'s Third Set of Discovery.

**OBJECTIONS TO REQUESTS FOR ADMISSION 1-17,  
INTERROGATORIES 1-45, AND DOCUMENT REQUESTS 1-3**

WorldCom objects to these requests in their entirety. With respect to the Requests for Admission, the issues presented are not properly resolved through that discovery tool. Requests for Admission are properly used to obtain agreement on uncontroversial factual matters so that neither party must unnecessarily waste resources establishing such facts. The Requests for Admission set forth in Verizon's Third Set of Discovery does not seek admissions regarding such factual matters, but instead asks WorldCom to concede that Verizon's positions with respect to various issues is correct. WorldCom obviously will not so concede. More importantly, however, per the FCC's February 1, 2001 Public Notice establishing procedures for arbitration of interconnection agreements between Verizon and WorldCom, direct testimony supporting WorldCom's positions and opposing Verizon's position shall be filed and served in the "form of affidavits," with supporting documentation, expert reports and exhibits. The evidence will include "a complete statement of all opinions to be expressed by the expert, the basis and reasons for each opinion and all data or information considered by the witness in forming those opinions." (FCC Public Notice at p. 7) Per the Commission's March 27, 2001 letter, WorldCom will provide its direct case in its Direct Testimony to be filed on July 19, 2001. Verizon's attempt to have WorldCom submit what is the functional equivalent of testimony in the guise of Requests for Admission is procedurally inappropriate, vexatious and harassing.

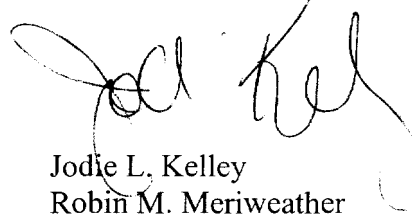
Verizon's Interrogatories suffer from the same flaw. The interrogatories direct WorldCom to provide substantive commentary on Verizon's proposal, and to explain why WorldCom's proposals are superior to Verizon's. Such information is appropriately provided through the testimony process set up by the Commission; that careful process should not be circumvented through discovery requests. The interrogatories are also overly broad and not designed to lead to the discovery of admissible evidence. Moreover, many of the interrogatories seek information that is not relevant to the issues presented. For example, Verizon frequently asks WorldCom to provide it with the number of customers served in a particular manner. The response to such an interrogatory has no bearing on WorldCom's legal entitlement to the service or element at issue.

Verizon's document requests seek, *inter alia*, all documents relied upon in answering the interrogatories. Because the interrogatories are inappropriate the document request is as well. The other two requests are overbroad, and seek information that is not relevant to the issues presented and not designed to lead to the discovery of any admissible evidence.

Lisa B. Smith  
Kecia Boney Lewis  
WorldCom, Inc.  
1133 19th Street, N.W.  
Washington, D.C. 20036

Allen Freifeld  
Kimberly Wild  
WorldCom, Inc.  
1133 19th Street, N.W.  
Washington, D.C. 20036

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jodie L. Kelley". The signature is fluid and cursive, with the first name "Jodie" and last name "Kelley" clearly distinguishable.

Jodie L. Kelley  
Robin M. Meriweather  
Marc E. Isserles  
Jenner & Block LLC  
601 Thirteenth Street, N.W.  
Washington, D.C. 20005

## **CERTIFICATE OF SERVICE**

I do hereby certify that true and accurate copies of the foregoing “Objections of WorldCom to Verizon Virginia Inc.’s Third Set of Discovery to WorldCom” were delivered this 5th day of July, 2001 in the manner indicated below. Copies were also served electronically on each parties’ designated representatives.

Karen Zacharia  
David Hall  
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Kelly L. Faglioni  
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Richmond, VA 23219-4074  
*\* By Federal Express*

Catherine Kane Ronis  
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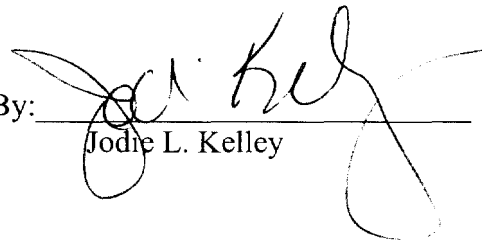
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Washington, D.C. 20036  
*\* By Regular Mail*

By: \_\_\_\_\_

Jodie L. Kelley

A handwritten signature in black ink, appearing to read "Jodie L. Kelley", is written over a horizontal line. The signature is stylized with large, flowing loops and a long horizontal stroke extending to the right.